## **EXHIBIT 2**



## Summons

in the matter of Neldon Joh	nson (TIN	#	and Gleno	la Johnson (TIN #			)			
Internal Revenue Service (D		Small Busines	s/Self-Empl	oyed						
Industry/Area (name or nu		Western Area								
Periods: Calendar year ending	Decemb	er 31, 2012								
		The Comn	nissioner	of Internal Rev	venu	e				
To: Wells Fargo Bank			· <u>.</u>			<u> </u>				
At: Subpoena Processing; 270	00 S Price	Road, 2nd Floo	r, Chandler	, AZ 85286						
You are hereby summoned and recan officer of the Internal Revenue 5 and other data relating to the tax administration or enforcement of the In ficu of appearance, you may Please produce for examination memos, cancelled checks, and Johnson (TIN # 529-64-5183). The term 'credit memos' include evidencing the payor bank natural and wired funds. The term 'de memoranda evidencing the receiving such transferred and orders. The term 'accounts' incaccounts, merchant accounts,	llability or ne internal re mail the modes internal recitive ow des internal recitive particular that memoral pit	the collection of evenue laws con- following docu- of signature card mass drawn on a constant of a signal and external yor account nata includes internal includes internals. The term 'cois not limited to	the tax liabiliceming the permitted to the counts white for the permitted the permitted that the permitted the per	bank statements, the purpose address below be bank statements, the cither Neldon and December 201 ars of funds and wayor account nurrical bank transfer unt name and the ceks' includes courte, savings accounts, savings	se of head of the force bank Johns 11 - Johns 11 - Johns of free of free of the force according to the force of the force	the periods the date deposit s son (TIN anuary 20 and includ or the ac- iunds and ient acco checks, ca unts, mon	of the lips, of th	y offense ovn.  appearantleposit ite 3-60-9880  y internal s paying s s and inclumber for 's checks arket acce	connected  mee.  memorar such trans ludes any ir the accou	t da anda aferred internal unts ey estment
You are authorized to receive transport of the records reques the issuing officer listed below	sted in this	s summons. If the summons of the sum	he amount o	costs directly related for direct costs is example.  n this space	ted to	the searced to exc	ch for eed th	, reproductis amoun	ction of, a it please co	nd ontact
**				**************************************						
Business address and te 50 South 200 East, MS: 4544										
Place and time for appea										
	the	30th	day of	October		2015 (year) day_of	at	10 October	o'clock	a m. 2015 (year)
Department of the Treasury Internal Revenue Service		MAN CHARL				Revent	ie Ag			
·ino moss	Darre		of issuing of	net and the second of		Davas	10 A s	Titte vent Grow	e p Manage	٠r
Form 2039 (Rev. 12-2001)	Dewey	D Parker Signature of appro	ving officer (ii	applicable)		Reven	uc ME	Title		•
Catalog Number 21405J		Brazini z ze zabby		.,			Ori	ginal —	to be kep	pt by IRS



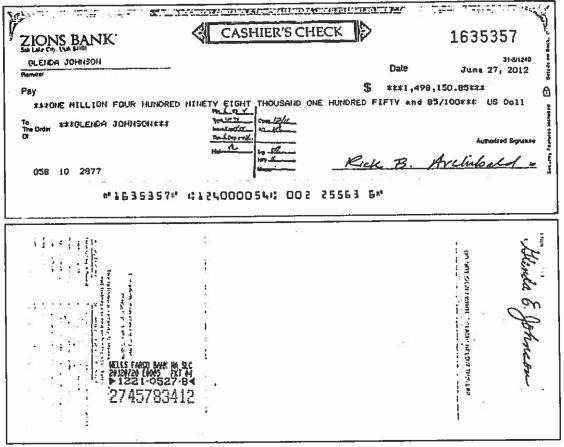
## Service of Summons, Notice and Recordkeeper Certificates (Pursuant to section 7603, Internal Revenue Code)

Date		Time
10/01/	2015	
	I certify that I handed a copy of the § 7603, to the person to whom it was a copy of the person to whom it was a copy of the second copy of the person to whom it was a copy of the person to	e summons, which contained the attestation required by was directed.
How Summons Was	§ 7603, at the last and usual place the copy with the following person	
Served	§ 7603, by certified or registered was directed, that person being a I sent the summons to the following	ummons, which contained the attestation required by mail to the last known address of the person to whom it third-party recordkeeper within the meaning of § 7603(b).
$\mathcal{C}$	Subpocna Processing; 2700 S Price	Road, 2nd Floor, Chandler, AZ 85286
Signature Vo	THEO	Title
	, when	Revenue Agent
		7013 2250 0000 3268 1444
Section 7609. Th	e is made to show compliance with IRC s certificate does not apply to summonses ficer or employee of the person to whose	whether or not records of the business transactions or affairs of an identified person have been made or kept.
liability the summ	nons relates nor to summonses in aid of ermine the identity of a person having a nt or similar arrangement, or to determine	I certify that, within 3 days of serving the summons, I gave notice (Part D of Form 2039) to the person named below on the date and in the manner indicated.
Date of giving I	Notice: 10/01/2015	Time;
	e: Neidon & Glenda Johnson	
Name of Notice		
	407.5 S 4000 Wast Dalta II	T 84624
Address of Noti	cee (if mailed): 4035 S 4000 West, Delta, U	T 84624 7013 2250 0000 3268 1468 <b>P</b> o
Address of Noti	cee (if mailed): 4035 S 4000 West, Delta, U	7013 2250 0000 3268 1468 Pe
Address of Noti 3 2250 000  How 🖾  Notice	1 3268 1482 TP I gave notice by certified or registered mail to the last known address of the noticee.	7013 2250 0000 3268 1468 Po
Address of Noti 3 2250 000 How 🖾 Notice	I gave notice by certified or registered mail to the last known address of the noticee.  I left the notice at the last and usual place of abode of the noticee. I left the copy with	7013 2250 0000 3268 1468 Polyage and the person summoned.
Address of Noti 3 2250 000 How 🖾 Notice Was 🗅	l gave notice by certified or registered mail to the last known address of the noticee.	7013 2250 0000 3268 1468 Polyage and the person summoned.
Address of Noti 3 2250 000 How M Notice Was D Given	I gave notice by certified or registered mail to the last known address of the noticee.  I left the notice at the last and usual place of abode of the noticee. I left the copy with	7013 2250 0000 3218 1468 Pe ☐ I gave notice by handing it to the noticee. ☐ In the absence of a last known address of the noticee, I left the notice with the person summoned. ☐ No notice is required.
Address of Noti 3 2250 000 How 🖾 Notice Was 🗅	I gave notice by certified or registered mail to the last known address of the noticee.  I left the notice at the last and usual place of abode of the noticee. I left the copy with	7013 2250 0000 3268 1468 Polyage and the person summoned.
Address of Noti 3 2250 000 How Solution Notice Was Common Signature I certify that the	l gave notice by certified or registered mail to the last known address of the noticee.  I left the notice at the last and usual place of abode of the noticee. I left the copy with the following person (if any).	7013 2250 0000 3268 1468 Pool 1 gave notice by handing it to the noticee.  In the absence of a last known address of the noticee, I left the notice with the person summoned.  No notice is required.  Title Revenue Agent

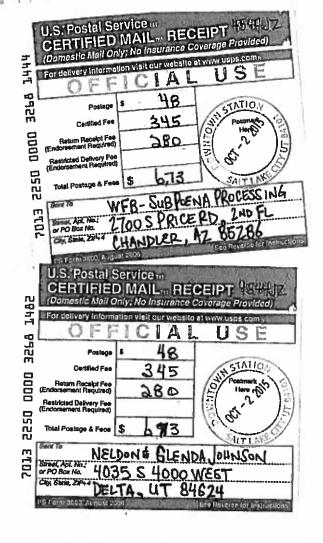
Form 2039 (Rev. 12-2001)

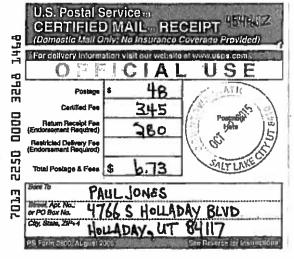
**REX Previewer** 

Page 3 of 3



Date:07/23/12 Seq #:94126110 Account:2255636 Serial #:1635357 Amount:\$1,498,150.85 Dep Seq #:-





TV transfer that the state of t	COMPLETE THIS SECTION ON DELIVERY				
SENDER: COMPLETE THIS SECTION	THE RESIDENCE OF THE PARTY OF T				
Complete Items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you.	A Signature BE Agent				
Attach this card to the back of the maliplece, or on the front if space permits.	D. is delivery eddress different from item 17				
1. Article Addressed to: WFB-BUBPOENA PROCESSING	H YES, enter delivery address below: (III No				
2700 S PRICE RD, 2ND FL					
CHANDLER, AZ 85286					
9590 9403 0405 5163 7832 94	3. Service Type Priority Met Express® Priority Met Express® Priority Met Express® Packet Expressor Pastricted Delivery Repaired Met Restricted Delivery Cortified Met Restricted Delivery Return Receipt for Merchandles Priority Met Priority Restricted Delivery Priority Method Restricted Method Priority Method Restricted Method Priority Method Restricted Method Priority Method Restricted Method Priority Method Pri				
2. Article Number (Transfer from service lebel) 7013 2250 0000 3268 1444	☐ Collect on Delivery Restricted Delivery ☐ Insured Mail Restricted Delivery [mer #800]				
PS Form 3811, April 2016 PSN 7530-02-000-9053	Domesila Ratum Reca				
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY				
Complete items 1, 2, and 3.  Print your name and address on the reverse so that we can return the card to you.  Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature  X. C. Agent  B. Flecelved by A violed Name)  C. Date of De  10-5-1				
1. Article Addressed to:	D. Is delivery address different from item 1? Yes				
NELDON & GLENDA JOHNSON	A STATE OF THE STATE OF THE STATE OF				
4035 S 4000 WEST	The state of the s				
DELTA, UT 84624	the second second second second second				
ET M MET DE COMPET SMELLE DE CEL ET E DOC HET TRECCH EL DE RIME E DEC	3. Benvice Type  Adult Signature  Adult Signature Restricted Delivery  Coultied Mattin  Country  Coultied Mattin				
9590 9403 0405 5163 9021 14	Continued Mails Restricted Delivery   Return Receipt for   Collect on Delivery   Collect on Delivery   Collect on Delivery   Collect on Delivery Restricted Delivery   Collect on Delive				

The state of the s	CONTRACTOR OF CO.
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
Complete terms 1, 2, and 3,  Print your name and address on the reverse so that we can ratum the card to you.  Attach this card to the back of the maliplece, or on the front if space permits.	A Significant Maps III Agent III Address III Fiedelived by Printed Name    C. Date of Delit   Cutte McLeshall
PAUL JONES 4766 S HOLLADAY BLVD HOLLADAY, UT 84117	D. to delivery address different from Item 1?   If YES, enter delivery address below:   No

3. Service Type

Adult Signature

Adult Signature

Adult Signature Restricted Delivery

BYCertified Meli®

Certified Meli Restricted Delivery 

Collect on Delivery
Collect on Delivery
Collect on Delivery Restricted Delivery Make the Collect on Delivery Restricted Delivery Restricted Delivery Restricted Delivery Restricted Delivery Restricted Delivery Restricted

PS Form 3811, April 2015 PSN 7530-02-000-8053

IN THE REPORT OF THE PROPERTY OF THE PROPERTY

9590 9403 0405 5163 9021 21

2. Article Number (Transfer from service tab

7013 2250 0000 3268 14